

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 24-CV-20600-KMW
WILLIAMS/GOODMAN

TEAM MARKETING GROUP INC.,

Plaintiff,

v.

VERIZON COMMUNICATIONS INC. and
TRACFONE WIRELESS, INC.,

Defendants.

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER
THE COMPLAINT**

Verizon Communications Inc. and Tracfone Wireless, Inc. ("Defendants"), through undersigned counsel, hereby move under Federal Rule of Civil Procedure 6(b)(1) and S.D. Fla. Local Rule 7.1 for a 30-day extension of time, up to and including May 5, 2024, to file a response to the Complaint (Doc. No. 1). In support of this Motion, Defendants state as follows:

1. Plaintiff filed its Complaint on February 15, 2024. (Doc. No. 1).
2. Plaintiff served process on Defendants on March 15, 2024.
3. Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i), Defendants' deadline to answer or otherwise respond to the Complaint is April 5, 2024.
4. Good cause exists for the requested 30-day extension of time to answer or otherwise respond to the Complaint as Defendants recently retained undersigned counsel and require additional time to prepare responsive papers.
5. This Motion is made in good faith and not for purposes of delay.

6. On March 22, 2024, counsel for Defendants conferred via email with Plaintiff's counsel regarding the relief herein requested. Plaintiffs do not oppose the requested extension.

WHEREFORE, Defendants respectfully request that the Court grant this Motion and extend the deadline for Defendants to file a response to the Complaint to May 5, 2024.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(3)

On March 22, 2024, counsel for Defendants conferred via email with Plaintiffs' counsel regarding the relief herein requested, to which Plaintiff agreed.

Dated: March 25, 2024

/s/ John J. Delionado

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